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October 31, 2003

Mrs. Anne Taylor, Acting Chairman  
Snow Hill Planning and Zoning Commission  
P.O. Box 348  
Snow Hill, Maryland 21863

Dear Chairman Taylor:

Thank you for providing the Maryland Department of Planning an opportunity to review the draft 2003 Snow Hill Comprehensive Plan. The Town is to be commended not only for updating its Comprehensive Plan consistent with the six-year review requirement, but also for taking advantage of the Community Legacy Program to conduct a visioning process which concluded with the development of a Strategic Revitalization Plan for the Town.

The draft Comprehensive Plan was forwarded to a number of State agencies for review, including the Departments of Transportation, Environment, Natural Resources, Business and Economic Development, Housing and Community Development, Agriculture, and the Maryland Emergency Management Agency. To date, we have received comments from the Departments of Business and Economic Development and Housing and Community Development, and those comments have been attached for your consideration. Any comments received after the date of this letter will also be forwarded.

Our planning staff has reviewed the draft plan for consistency with Article 66B and the State's growth management policies. We have included recommendations that we believe will strengthen the Plan with respect to the Town's stated goals, objectives, and policies.

Please contact Tracey Gordy at 410.749.4618 or me at 410.767.4620 if you have any questions about these comments, or if we can be of further assistance. Thank you for allowing us the additional time to review the Plan and the Department looks forward to continued planning coordination with the Town of Vienna.

Sincerely,

Patricia Goucher, Director  
Local Planning

Cc: Tom Rimrodt  
Tracey Gordy

**Maryland Department of Planning  
Review Comments  
Draft Snow Hill Comprehensive Plan**

**1. The Visions**

Maryland's Planning Act of 1992 and subsequent legislation in 2000 requires that the eight visions be included in and implemented through the comprehensive plan. The Visions are not included, nor indirectly referred to in the Plan. It is recommended that the Town include the eight visions, as well explain how each one will be addressed through stated objectives, policies, and recommendations in the Plan.

**2. Article 66B Mandated Elements**

The Plan contains all of the elements mandated by Article 66B. Since the Plan states that no surveys have been conducted to determine the amount of land in and around the Town that have mineral resource extraction potential, the mineral resources element has been adequately addressed within the Sensitive Areas section.

**3. Population Projections and Housing Unit Characteristics**

We have completed our review of the population and housing unit characteristics presented in the Snow Hill Comprehensive Plan, with respect to Department of Planning data and information. For the most part these data are census related and comparable to data we maintain.

The Plan document however, bases most of its objectives using a projected population of 5,000 inhabitants in 2015 that increases to 5,500 persons by the year 2020 (pages 14 and 5, respectively). Based on the Town's historical and current population growth patterns, and population components, it is not likely that the Town will experience this degree of growth without major new residential development activity and sudden influx of population.

Table 1. SNOW HILL POPULATION TRENDS: 2002 - 1970

2002 Census Estimate	2000 Census	1990 Census	1980 Census	1970 Census
2,406	2,409	2,217	2,192	2,201

Table 1 above displays historic and current U. S. Department of Commerce, Bureau of the Census population data for the Town of Snow Hill.

The Town's population shows negligible growth during the 1970s and Eighties. It experiences a substantial population increase during the 1990's (about 200 persons).

What population increases the Town has experienced during this time period is the result of the increase in the Group Quarters population located within the Town's boundaries (See Table 2).

Table 2. SNOW HILL GROUP QUARTERS POPULATION TRENDS: 2000 - 1980

2000 Census	1990 Census	1980 Census
378	61	86

The 2000 Census Group Quarters population in Snow Hill consists of 248 persons in Correctional Facilities and 121 persons in Nursing Homes. During the 1990 Census, all persons counted as Group Quarters population resided in Nursing Homes.

Therefore, the Town's household population for the period has actually declined from 2,106 persons in 1980 to 2,040 persons in 2000, a decrease of three percent (66 persons) over the 20-year period. Chart 1 graphically depicts Snow Hill's Group Quarters and Household population trends over the last three decennial censuses. The decline in household population is more significant over the recent 10-year period from 1990 to 2000, when the decrease in household population from 2,156 to 2,040 is over five-percent (116 persons).

Since the household population for the Town of Snow Hill has not grown appreciably since 1980, it has not experienced growth pressures comparable to that of the balance of the County. So, while it is likely the County population may continue to grow as it has in the recent past, there are no indications that Snow Hill town will experience comparable growth (See Chart 2).

Chart 1. Snow Hill Population:  
1980, 1990 and 2000

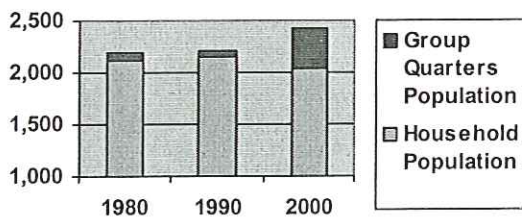
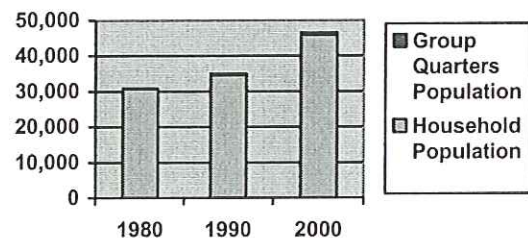


Chart 2. Worcester County  
Population: 1980, 1990 and 2000



The Plan's population projection indicates the Town's population will more than double in size, growing at over five times the rate of the County's population through the year 2015 (See Table 3). During our review of the Plan, we prepared a series of reference projections for the town population using different techniques for evaluation purposes. These projections appear in Table 3 as well.

The first reference projection is based on a technique using historic population growth trends. This projection yields the lowest population for Snow Hill by the year 2015. This projection slows the current population decline and eventually adds 134 persons to the Town population by the year 2015. It assumes an average annual growth rate of about one-third that expected for Worcester County over the same period.

The second reference projection assumes that the ratio of Snow Hill's Household and Group Quarters populations will remain in constant proportion to the Department of Planning's Household and Group Quarters population projections respectively for Worcester County. This projection produces the highest total population of the three reference projections for Snow Hill in the year 2015. It adds almost 500 persons to the Town's population at slightly higher than a 20-percent increase in total population. It also infers that over one-half of the County's Group Quarters population will reside within Town boundaries.

The third reference projection also presumes that Snow Hill's household population decline halts, then increases. For this option, Snow Hill's household projection is the same average annual rate as the household population projection for Worcester County. It also presumes the Group Quarters population is constant throughout the time period. This projection increases the population of the town by over 300 inhabitants.

We feel that the range provided by the Reference Projections (between 2,500 and 3,000 inhabitants), provides a suitable expectation of the population size of Snow Hill through 2015.

Table 3

### **SUMMARY OF SNOW HILL REFERENCE POPULATION PROJECTIONS**

TECHNIQUE	Change 2000 - 2015				
	2000	2015	Net	Percent	AAGR
Regression	2,409	2,543	134	5.55	0.36
Ratio Proportion	2,409	2,896	487	20.20	1.23
Component Growth	2,409	2,715	306	12.70	0.80
Comprehensive Plan	2,409	5,000	2,591	107.56	4.99
WORCESTER	46,543	53,750	7,207	15.48	0.96

Prepared by the MD Department of Planning, Strategic Development, 2003

#### 4. Section II – Land Use

- The final paragraph on page 11 states, “The following long-range Land Use Objectives establish a direction for local efforts to encourage new growth while preserving the significant character of the Town”, however no real objectives are listed in this section. There are basically only two items addressed and they are annexation and an intergovernmental cooperative agreement. Although the intergovernmental agreement is a great idea for inter-jurisdictional cooperation and streamlining purposes, it does not address the stated land use goals. The annexation portion is very relevant to future land use, but the bulk of the annexation section is merely a series of unanswered questions. This is a very important section of the Plan, especially given Snow Hill’s current growth pressures. The Land Use objectives should be clearly stated and elaborated upon in much greater detail.
- The second paragraph on page 12 states, “Maryland’s Smart Growth efforts support this approach and many programs have been created to carry it out.” It should be further explained how Smart Growth supports Snow Hill’s approach towards fringe development and, for the average citizen unfamiliar with State growth policy, more detail about the relevant programs would be helpful and informative.
- At the end of the third paragraph on page 12, it is noted that there are only 8 acres of undeveloped commercial land and 19 acres of undeveloped industrial land in Snow Hill, however the Land Use Table on page 8 lists 9 acres and 20 acres respectively.
- The Land Use Plan Map shows a significant area of low-density residential development, which is defined in the Plan as 3 to 4 dwelling units per acre. The Town may want to take into consideration that the Priority Funding Area criteria requires an average permitted density of at least 3.5 units per acre.
- The Mixed Density Residential category does not appear to allow for any limited or neighborhood commercial uses. The Town may want to consider some limited commercial uses in this category as the only other category that provides this option is the mixed-use category.
- The General Business and Highway Business land use categories are not indicated as such on the Land Use Plan Map. In addition, most of the proposed land use along the Route 113 Bypass is slated for residential uses. There is very little allowance for the Highway Commercial or General Business categories.

- The Plan should take more of an opportunity to discuss the relationship between the Strategic Plan and the Comprehensive Plan, particularly with regard to redevelopment issues in Snow Hill.

## 5. Section III – Community Facilities

- The first bullet on page 17 refers to the “Comprehensive Plan Map”. It is unclear as to which map the Plan is referring.
- The second bullet on page 17 needs clarification. As written, it appears as if the Town’s policy is to allow low-density residential development on individual septic systems and it is our understanding that this is not Town policy.
- The first full paragraph on page 18 states, “According to population projections, ...” It would be helpful to specify whose projections the Town is using. This same paragraph also addresses projected flows, however the Detention Facility is not included in those projections.
- The Sewerage System Section explains that with expected increases in flows the treatment plant will be over capacity by 2015. This is especially true if the Town experiences the population increase projected in the Plan. However, the Plan does not address how the Town proposes to handle this situation. The Sewerage System Section provides no real recommendations aside from updating the Worcester County Water and Sewer Plan, which alone will not solve the Town’s capacity issues. This section is a critical one given the number of annexation requests the Town is considering and it should be greatly expanded to include treatment levels, plans for a new plant/treatment system, how new development will be handled, etc...
- We recommend that the MDP quote in the Sewerage System Recommendations Section be removed. Although it may be accurate that the County’s Water and Sewer Plan is “currently out of date and out of compliance”, we believe that it would be more beneficial to both the County and the Town to include a positive statement here to indicate that local government will work together on the Water and Sewer Plan update in order to address mutual growth issues.
- The projected flows included in the Water System Section do not include projections for the schools and the detention facility. In addition, the second paragraph of the Water System Recommendations Section states that, “The Town replaced a portion of the water distribution system in 1990, but further upgrades are recommended.” The Plan should elaborate on what recommendations were made.
- The final paragraph of the Schools Section explains that, with the exception of the Middle School, all of the schools face potential crowding

issues in the future, but the Board of Education has many options to avoid overcrowding. What are some of those options? What is the Town doing to address this potential problem?

- The Parks and Playgrounds Section should be greatly expanded given the large number of park facilities in Snow Hill and given the important role these parks play with respect to the Town's character. For instance, the Gateway Park is not mentioned in this section and Snow Hill was the only municipality on the Eastern Shore to receive Federal grant monies to create this waterfront park/bioretention facility. The National Park Service nationally advertises this site as a Chesapeake Bay Gateways Demonstration Project, which is to serve as a model for other jurisdictions. Fisher Park and the other "pocket parks" are not mentioned. Goat Island is mentioned, but nothing has been included to explain the significance of this island or even how it got its intriguing name.
- In the Parks, Playgrounds, and Open Space Recommendations Section, we recommend that more of Byrd Park's attributes be stated in order to give a more positive impression of the park. In addition, it is relevant to include that the Town is currently in the process of developing a master park plan for Byrd Park and that the Worcester County Fair is in the process of relocating to Byrd Park. The Plan should explain the amenities the Town is in the process of adding in order to accommodate the Fair. The Town has also just completed a new ADA compliant playground in the park and this should be included in the Plan as well.
- This same recommendation section should list the amenities in Gateway Park and highlight more of the positive aspects of Sturgis Park. The Snow Hill High School Play Field and J. Walter Smith Park are mentioned in this section for the first time, which presents a disconnect from the previous Parks and Open Space Section where they are not referenced. If these parks provide a significant recreation function in the Town, then they should be included in both sections.

## **6. Section IV - Transportation**

- The existing street system in the Town is well connected and forms a grid pattern. Such a system has been proven to be pedestrian friendly and efficient for car circulation as well. Extending and building a similar street pattern into new development areas will benefit the Town. The Town may want to consider a strong policy statement that encourages enhancing and building a well connected grid system for the Town as a whole, including existing communities and future growth areas.
- This majority of future growth is planned toward the area between the Town and U.S. 113 (Bypass). Future property access onto U.S. 113 from the adjacent development could be an issue. Local access

control/management policies and regulations play a critical role in successfully protecting state road capacity and integrity. We suggest the Town include an access control/management policy that addresses the U.S. 113 capacity protection. An access management policy should also be considered for future developments along Business/U.S. 113.

- The Waterways Section of the Plan could be greatly expanded given the extraordinary resource and economic benefits the Pocomoke River provides the Town.

## **7. Section V - Economic Improvements and Community Revitalization**

- The Town of Snow Hill is listed as a potential target investment zone in the Lower Eastern Shore Heritage Areas Management Plan and the benefits of this status should be explained in detail in this section of the Plan. Furthermore, the Heritage Areas Act requires specific implementation language be included in the comprehensive plan. Snow Hill recently did a comprehensive plan amendment to include this language and it has not been included in this Plan update.
- This section may be the most appropriate one to include information about the location, function, benefit, and re-certification process of the Snow Hill Enterprise Zone.
- The civic-led, community betterment program proposed on page 30 is an excellent idea. Since the "Snow Hill Tomorrow" group has now been appointed, it would be a good idea to update this section to talk about this new organization and its mission.

## **8. Section VI - Sensitive Areas**

- It should be noted that perennial and intermittent streams within the Critical Area require a 100-foot Buffer. In addition, the Town does have some Buffer Exemption Areas, not Buffer Exclusion Areas.
- The fourth bullet on page 31 is misleading in that it states the Snow Hill Forest Conservation Program will protect sensitive areas through long-term protection methods. It is recommended that the Town work with the Forest Conservation Coordinator to accurately address the Forest Conservation Act requirements included in this section.
- The fifth bullet on page 31 states that, "The Town will maintain maps of streams and buffers, wet fields, floodplains, habitat areas, and wetlands for reference by landowners and developers." Although this is an excellent idea for a policy statement, is it likely that the Town will be able to actually meet this request upon citizen/developer demand?

- The second paragraph in the Floodplain Management Section on page 32 indicates that there are three major floodplain areas, however four are listed. The last floodplain area, Hayes Branch Forest Preserve, has been left blank and needs to be completed. It is recommended that an additional paragraph be added to the Floodplain Management Section to explain the purpose, general requirements, and environmental benefits of the floodplain regulations.
- The Chesapeake Bay Critical Area Section on page 33 needs to be greatly expanded since a large portion of the Town is affected by this regulation. It is recommended that the Town work with its Critical Area Circuit Rider to develop a more detailed Critical Area section for the Plan.

## **9. Section VII - Development Regulation and Management**

- The zoning regulations for the Town are inadequate given current development pressures. This section should stress the need for a new zoning ordinance and a comprehensive rezoning of the Town. The first paragraph of the Zoning Regulations Section on page 36 states that the last comprehensive plan was adopted in 1986. Our records indicate that the last comprehensive plan update was completed and the Plan adopted in September of 1997. The second paragraph of this same section states new zoning districts are often created for annexed areas. This is not necessarily true as more often annexed land is classified according to the existing municipal zoning category that is most similar to the County land use category. We recommend that statement be clarified or else eliminated. Also in this paragraph is a statement that the town should look at zoning approaches suggested by the Department of Planning for possible application in Snow Hill. The Department is unaware of what is meant by this statement and would ask for further clarification.
- On page 36, two future industrial zoning categories are listed. Is the Town considering new heavy industrial zoning in the Bay Street area and new light industrial zoning in the Bay, Washington, and Timmons Street areas?
- It is recommended that Priority Funding Areas (PFA's) be discussed in the Plan with respect to annexation, growth, and development.
- The Plan, and this section in particular, contains many good suggestions and outlines several opportunities for inter-jurisdictional cooperation and regulatory streamlining, such as the intergovernmental cooperative agreement and the development monitoring system. It would be very beneficial to the Town to implement these progressive concepts.
- The Capital Improvements Programming and the Fiscal Analysis are both good ideas and certainly worth pursuing. They could prove to be a huge asset to the Town's planning and implementation processes.

## 10. Additional Comments

- The Table of Contents does not correspond to the actual sequence of sections and the section titles in the Table of Contents are different in some cases than what is contained in the document.
- The Percent of County numbers in Table 1 on page 6 need to be recalculated and rounded off consistently.
- Table 3, Snow Hill Land Use, on page 8 is very difficult to read and interpret. This table should be simplified in order for the reader to have a better understanding of what the numbers mean. Also, the numbers in the text of the document do not correspond to the numbers in the table and the numbers in the table do not add correctly or round consistently. In addition, the land use data utilized in the table is dated June of 1996. More recent data should be utilized if it is available.
- The maps would have been a great help in translating this Plan text, but unfortunately most of the maps were either incomplete or hard to read. The corporate boundary and existing land use maps were hard to read in black and white. The growth area map was not parcel specific, so many areas were left blank with no designation. The proposed land use map was blank. The water and sewer maps are not the final approved areas per the recent amendment and will soon be revised again. The future transportation map was also blank, however the downtown area enhancements and town wide enhancements maps were excellent. It is recommended that the maps be prepared and reviewed extensively prior to Plan adoption.
- In general, the formatting of the document makes it difficult to read. The goals and objectives are not clear in some sections, but are very clear in others, just due to the difference in formatting from chapter to chapter. The bullet and numbering system is inconsistent – sometimes letters are used, other times numbers, sometimes asterisks, and other times even dollar signs are used. It would really improve the overall look and readability of the document if it were better formatted.